

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: :  
Desiree M. Kakos : Chapter 13  
Evangelos G. Kakos : No.: 21-10271-AMC  
Debtor(s) :  
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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY DAIMLER TRUST

Debtors, Desiree & Evangelos Kakos, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Daimler Trust submit the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Denied. Debtors aver the account has been brought current.
5. Admitted.
6. Denied.
  - a. Denied. Debtors aver payments have been made and the account is current to date.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Respectfully submitted,

Dated: September 2, 2021

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor

Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**William C. Miller, Esq.**  
Chapter 13 Trustee

**William E. Craig**  
Attorney for Movant  
Electronic Notice to *ecfmail@mortoncraig.com*

Dated: September 2, 2021

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
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1315 Walnut Street  
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